

From: HOPE Bruce
Sent: Monday, January 29, 2007 5:13 PM
To: 'Shephard.Burt@epamail.epa.gov'
Cc: PETERSON Jenn L
Subject: PH FW model comments
Burt,

Here are my comments on Appendix H of the Round 2 report. Feel free to use them whole or in part without attribution. The attached email relates to my Comment #14.

I think the two biggest issues are (1) their focusing the model toward the average, so we lose sight of how much uncertainty surrounds that average (I simply don't think they have enough data to start invoking the central limit theorem) and (2) all the complications associated with trying to model mixtures. This mixtures business could be their way of avoiding analyzing for congeners or an attempt to make use of all the mixed data (for Aroclors, etc.) that we have.

I think we can still get to probabilistic PRGs but if they want to stick with normal distributions parameterized with the standard error, then we should just go back to a deterministic model.

Bruce